

1 A Yes, sir.

2 Q Now you told me that Greenup County was interested
3 in 10 to 15 units? Correct?

4 A Yes, sir.

5 Q Okay. So for this testing to work properly you'd
6 have to have those 10, 15 units sitting there and then you
7 call those numbers and you test to see if the group call
8 function is working? Correct?

9 A Yes, sir.

10 Q Is that what you did?

11 A Yes, sir.

12 Q Well, I don't understand why you had a problem
13 making the group call function work and what it has to do with
14 telephone numbers.

15 A Well, the part about it, just because you dialed it
16 and just because you have 15 pagers there, if all 15 of them
17 don't go off you have a problem.

18 Q Okay.

19 A And we had had problems. It would go like the first
20 three would go off and then it would stop, and the next time
21 you'd try it the first two would go off. We never got the
22 whole 15 pager sequence to work.

23 Q Okay. But those pagers wouldn't have been out there
24 in the field, right? They're sitting there on the desk in
25 front of you? Correct?

1 A At one time, yes, but then also they were delivered
2 to the people and they also tried them theirselves in Ashland
3 and different places.

4 Q Okay. I can understand that. For this test to work
5 those pagers would have to be your 152.48 frequency?

6 A Yes, sir.

7 Q So all those paging units that you're talking about
8 for the Greenup County folks they had some very unique
9 features? They were on 152.48? They had a unique cap code
10 and you were trying to program to have this group call
11 function? Is that correct?

12 A I -- if you mean by unique cap code the same, they
13 all had different cap codes.

14 Q Okay.

15 A They did not have a unique cap code.

16 Q Correct, yes. We're in agreement on that. They had
17 to be different. Otherwise, you know, the same person would
18 have the -- would be beeped the same time as somebody else and
19 you might not necessarily want the same people to get paged?

20 A Well, that's why on theirs we had a group call plus
21 an individual number.

22 Q I follow. But now this testing wouldn't have gone
23 without your supervision, would it?

24 A Once -- whenever I was doing it it was -- I
25 supervised it, yes, or my secretary. When the gentlemen from

1 the fire department had it, I don't know how often they do
2 radio checks, but whenever they'd check their normal radios
3 they would also check this. Plus those gentlemen all had the
4 phone number and they could have called at any time in a 24
5 hour period and tried to see if it would work theirselves.

6 Q I follow. If I'm listening to -- if I'm monitoring
7 152.48 and I just happen to be monitoring it while you're
8 doing this group call feature and if it's working properly
9 when you test it, the only thing I'm going to hear is some
10 kind of digital blip? Isn't that correct?

11 A No, sir. They were tone voice pagers. As you asked
12 earlier, you would actually hear -- if it was working properly
13 you would hear the same voice message, "There's a fire at 1010
14 Russell Street," down the chain until all the pagers were
15 activated.

16 Q I follow. So that's what I would have heard if I
17 happened to be monitoring 152.48 while that testing was gone
18 on? I'd hear people talking?

19 A If it was working properly, yes.

20 Q If you wonder where I'm -- to close the loop then,
21 when we started this I was asking whether or not you had
22 repeated a series of tones sequentially over and over again as
23 part of this test and I gather that is not the case. Correct?

24 A No. You asked if I did that for 24 hours and I said
25 no, I never did that for 24 hours, but that's when I brought

1 in the chain part because that's what was malfunctioning.
2 Sometimes we could get eight of the chain to go off, but we
3 couldn't get the voice to transfer from one to the other so
4 what you would hear would be tones on the ones that didn't
5 work properly.

6 Q I appreciate that, Mr. Harrison. Again, you're
7 answering a question that's different than mine, than mine.

8 A Okay. Excuse me.

9 Q I didn't ask, I didn't ask you if you were doing the
10 group call testing 24 hours and that's what you're answering,
11 right?

12 A You said sending the tones out for 24 hours and no,
13 we didn't.

14 Q What I was trying to, to figure out is whether or
15 not a 24 hour sequential series of digital tones was a
16 standard part of this group call testing which you just
17 described and it sounds to me like it is certainly not a
18 standard part of that?

19 A Right.

20 Q Okay.

21 MR. HARDMAN: Your Honor, could we instruct Mr.
22 Joyce not to use oxymorons? Digital tone is a contradiction
23 in terms. It's either digital or it's a tone, not both.

24 BY MR. JOYCE:

25 Q Did I confuse you, Mr. Harrison?

1 A Some of your questions have, but --

2 Q Oh, I'm sorry.

3 A -- I've asked you to repeat the ones I didn't, so

4 --

5 Q If Mr. -- Mr. Hardman has now helped me clarify the

6 confusion. The signals that are going out for this group call

7 testing are not, are not digital signals in this particular

8 case?

9 A No, sir.

10 Q They're not at all?

11 A No, sir.

12 Q They're just tone and voice?

13 A Yes, sir.

14 Q Now, this is a -- the testing finished in September

15 of 1991? Is that fair to say, thereabouts?

16 A I don't know, sir.

17 Q Okay. Well, you testified earlier that you didn't

18 send the first bill to Greenup County until September of 1991.

19 I don't want to put words in your mouth, but --

20 A Right. As far as testing those, I would assume -- I

21 don't know for sure, but we still tested. There were people

22 -- we had to have two of them chained together and people who

23 just had one and we would test those on and off after that

24 period.

25 Q But for the most part the system was up and

1 | operating by September of 1991? Otherwise, you wouldn't have
2 | been sending them the bill? Correct?

3 | A It never did ever work properly. We ended up
4 | crediting their bill and getting the equipment back.

5 | Q When it, when it wasn't working properly, I presume
6 | you weren't on the air in some way, shape or form? Is that
7 | fair to say?

8 | A I don't -- I'm confused by your question, I think.

9 | Q Okay. I guess I'm trying to get a handle on what
10 | the definition of -- is when you say it wasn't working
11 | properly.

12 | A The, the voice would not come through all 15 pagers
13 | one right after the other.

14 | Q That kind of leads back to me with -- I had a non-
15 | technical way of saying you're not transmitting. If it -- if
16 | the system's not working, working properly, then I presume
17 | your signal's not going out? At least it's not hitting those
18 | pagers?

19 | A It wasn't hitting the pagers, but if one of those
20 | gentleman dialed the phone number it was still sent. They
21 | were all chained together and all you did was dial the seven
22 | digit number or the ten digit number and it would go -- if a
23 | certain number was called, it would go through all 15 pagers.

24 | Q I see. So that -- from the telephone call to the
25 | terminal that would appear to be working?

1 A Yes, sir.

2 Q Is that what you're saying? I follow.

3 A Then our transmitter would know to send a signal
4 whether all the pagers got it or not. That we never could get
5 to work.

6 Q Okay. Typically when a -- when your paging system,
7 your PCP system, wasn't -- this is going to sound like a
8 really stupid question, but I'll ask it anyway, Mr. Harrison.
9 Typically when your paging system doesn't work, I as a
10 layperson am presuming that that means you can't get your
11 signal out.

12 A Yes, sir.

13 Q Because, you know, in some other type of
14 communications, not this one, perhaps if your system's not
15 working you're just doing nothing but sending out noise on a
16 particular frequency 24 hours of the day. I mean, that would
17 be a different type of malfunction than what you're talking
18 about? Correct?

19 A I assume. I -- like I say, I'm not a technician,
20 sir.

21 Q But that's not what was happening when you were
22 saying you were having problems with the system?

23 A No, sir. The power would send the signal out and
24 the first pager, like I said earlier, would receive it and
25 then sometimes 5 of them might go off, sometimes 3, some 2,

1 but we never could get all 15 gentlemen to go off in sequence.

2 Q I follow. Did you have anything to do with
3 monitoring of this frequency?

4 A When I was testing I would just have a pager with
5 the squelch open listening to what was going through the
6 airwaves.

7 Q But that's different than something that's called an
8 off-air monitor to your knowledge?

9 A I don't understand the term off-air monitor, no,
10 sir.

11 Q Okay. When you're using the term monitoring, you
12 mean simply sitting in your office listening to what's going
13 on --

14 A Yes, sir.

15 Q -- on 152.48?

16 A Yes, sir.

17 Q You're not referring to some kind of automatic
18 feature built into the transmitter to monitor for RAM
19 Technologies' traffic, in other words?

20 A An inhibitor. If that's the same thing, I've heard
21 the term inhibitor and that is supposed to keep the people
22 from interfering with each other.

23 Q That's not what you mean when you say --

24 A No, sir.

25 Q -- that you'd monitor?

1 A No, sir.

2 Q Okay. At the top of page 2 of your declaration, Mr.

3 Harrison --

4 A Yes, sir.

5 Q -- it says, "We then tried different link

6 frequencies between the terminal in Charleston and the bay

7 station in Huntington because we thought the reason the system

8 was not working properly was that our transmissions were being

9 walked over by pages from WNJN 621 licensed to RAM

10 Technologies." Is that correct?

11 A Yes, sir.

12 Q Now, again, I'm not a technician, but I gather that

13 if your link frequency was having a problem that you couldn't

14 get a page out at all? Is that correct?

15 A The way I understand it is the link connected my

16 Charleston, Charleston to me and Huntington, and if the link

17 wasn't proper Charleston would send it but the link wouldn't

18 hand it off to Huntington, so it was being sent out in

19 Charleston but it was not being received in Huntington.

20 Q So that kind of a problem, from your understanding,

21 wouldn't cause transmissions to be going out over the air for,

22 you know, 24 hours?

23 A No, sir.

24 Q It would, it would not?

25 A As far as I know, sir, no.

1 Q When you shake your head, Mr. Harrison, it doesn't
2 get in the transcript so you have to say yes or no.

3 A Yes, sir.

4 Q Thank you.

5 JUDGE CHACHKIN: You said no sir to the question,
6 didn't you?

7 MR. HARRISON: Yes, sir.

8 JUDGE CHACHKIN: About the 24 hours? He did answer
9 the question.

10 MR. JOYCE: Yeah, he did. Prior to that he was
11 shaking his head, Your Honor.

12 JUDGE CHACHKIN: But he did answer while he was
13 shaking his head.

14 MR. JOYCE: Yeah.

15 JUDGE CHACHKIN: But then he said yes, sir after. I
16 don't know if that's confusing things.

17 MR. JOYCE: Oh, I'm sorry. I don't want to confuse
18 this issue. I've almost forgotten what my question was.

19 JUDGE CHACHKIN: You asked him about something about
20 the 24 hours, testing 24 hours.

21 BY MR. JOYCE:

22 Q If the link was down, that wouldn't mean that your
23 PCP system was sending out pages 24 hours a day, would it?

24 A As far as I know, no, sir.

25 Q And you testified that with the possible exception

1 of that one day when you or one of your assistants walked away
2 while you were doing the testing, for the most part you never
3 tested 24 hours a day around the clock? Isn't that correct?

4 A To the best of my knowledge, no, sir.

5 Q Were the -- the Greenup County volunteers, were they
6 the only customers on your paging system?

7 A No, sir.

8 Q There were others?

9 A Yes, sir.

10 Q How many?

11 JUDGE CHACHKIN: At which time are we talking about
12 now?

13 MR. JOYCE: At any time.

14 MR. HARRISON: It varied.

15 BY MR. JOYCE:

16 Q Okay. During that time period of, of testing in
17 1991, do you recall how many customers you had on the air?

18 A No, sir.

19 Q Is it possible that you didn't have any on the air
20 at all?

21 A No, sir.

22 Q That's not possible?

23 A No, sir, that's not possible.

24 Q So it was something between 0 and what?

25 A 0 and 100.

1 Q 0 and 100?

2 A Yes, sir.

3 Q Closer to 0 or closer to 100?

4 A Depending on which month and what time of the year,
5 sir.

6 Q So your, your customers tend to come and go on your
7 PCP system?

8 A The whole system overall we never really got to work
9 and people would get them today and bring them back tomorrow.
10 Some people would get them today and bring them back in a
11 week. Some people sent -- sometimes we'd think it was in the
12 actual pager unit itself and we'd replace the pager out. So
13 that -- that's the main reason it varied, but in paging
14 overall, yes, customers do just come and go.

15 Q Did -- had you already charged them for the service
16 when they went out the door?

17 A Yes, sir. Yes, sir.

18 Q What was your typical charge?

19 A I believe it started out at \$9.95 per month, sir.

20 Q That's just the air time service charge?

21 A That's air time and equipment and everything.

22 Q Oh, it's the whole kit and caboodle?

23 A Yes, sir.

24 Q So you're not giving them ownership of the paging
25 unit, I presume?

1 A No, sir.

2 Q You're renting it?

3 A Yes, sir.

4 Q When they came into your office what was the typical
5 procedure to sign up a subscriber? Would they fill out a
6 subscription form for you?

7 A Yes, sir. Not really a subscription form, just a
8 rental agreement saying their address, where they wanted the
9 bill to go and that, yes, they would pay for it.

10 Q You'd do these in triplicate, I guess, on some kind
11 of carbon paper so the customer gets to keep a copy and you
12 keep a copy? Is that --

13 A Yes, sir.

14 Q And this -- although you don't recall how many
15 customers, this was going on throughout the period of 1991
16 when you had your PCP system operating?

17 A What went on? I'm sorry.

18 Q Customers coming into your office. I'm sorry.

19 A Oh, yes, sir.

20 Q Signing up for service.

21 A Yes, sir.

22 Q Did any of them stay on the air? You say that some
23 of them turned them back the next day. Did any of them stay
24 on the air for more than a day?

25 A Oh, yes, sir.

1 Q How much longer than a day?

2 A There was some of them that stayed on until sometime
3 last year when we were instructed to turn the system off.

4 Q Would those have been subscribers that signed up
5 back in 1991?

6 A I have no idea, sir.

7 Q So this might have been somebody who just signed up
8 in the last year or so?

9 A It could have been, but it could also not have been,
10 sir.

11 Q These paging units, that's your inventory
12 presumably?

13 A Yes, sir.

14 Q I mean they cost money?

15 A Yes, sir.

16 Q I would presume that before you give them away to a
17 customer you want to have some kind of security for them. Is
18 that correct?

19 A We -- at that time we didn't do any type of credit
20 check. Now we do a credit check and if the credit's fine, no
21 deposit. If your credit's bad, we require a deposit.

22 Q But back in 1991 you didn't do that?

23 A No, sir.

24 Q Why would you be more concerned about your pagers
25 growing legs and walking away today than you would have been

1 back in 1991?

2 A I just manage my office, sir. I don't know why. We
3 didn't hook up to the credit bureau until probably about a
4 year or a year-and-a-half ago and that's when we were able to
5 type in and do the credit reports. We were always worried
6 about it, but we had no way of proving or disproving a
7 person's credit until we linked up with the credit bureau.

8 Q Okay. But you're answering a different question.
9 You're talking about the credit worthiness of your
10 subscribers, Mr. Harrison? Correct?

11 A I must have misunderstood your question then, sir.
12 You asked if I was worried about the equipment and the
13 trustworthiness of my customers goes hand in hand with
14 worrying about my equipment, yes.

15 Q Okay. The paging units themselves, you're saying
16 that the credit check would be one way of having security that
17 you're going to get that paging unit back?

18 A Yes, sir.

19 Q Today you ask for a deposit as well when you give
20 away a pager to somebody?

21 A If it's bad credit. If it's good credit, no, sir.

22 Q Were these policies the same for the RCC paging
23 system as they were for your PCP?

24 A Yes, sir.

25 Q How did you customers typically pay you for your PCP

1 service?

2 A Paid the first month's bill in advance and then we
3 sent them a monthly statement after that.

4 Q And then it's typically paid by check?

5 A Check, cash, money order. Every now and then Visa.

6 Q In 1991 do you recall -- and I'm just looking for a
7 ball park -- what your monthly revenues were from your private
8 carrier paging operations?

9 A No, sir. I have no idea.

10 Q I can't help but think that's a somewhat surprising
11 answer, Mr. Harrison, if you're in charge of your Huntington
12 office. Isn't that kind of a surprising answer?

13 A Yes, sir, but you're asking a specific month and a
14 specific year and I really can't honestly answer that.

15 Q All right. Give me a ballpark. The first month
16 that your private carrier paging system was up and operating I
17 presume is greeted with a certain amount of joy and excitement
18 in a new paging company. Isn't that correct?

19 A Yes, sir.

20 Q So as with the start of any new business, you sent
21 your pride and joys out there, your paging units. You sunk
22 some money into building your PCP system. You've got a boss
23 looking over your shoulder so you're pretty concerned about
24 being sure you can pay for the paging units and pay for your
25 paging system. Isn't that correct?

1 A The pagers were already paid for. We recrystalled
2 some pagers we had.

3 Q But you as the manager of the Huntington office
4 wouldn't be doing your job unless you were getting money
5 coming back into the business? Correct?

6 A Yes, sir.

7 Q So that would be an issue of concern to you?
8 Correct?

9 A Yes, sir.

10 Q So in your first month of operations -- I'm not
11 asking you for specific dollars, Mr. Harrison -- but I presume
12 you do recall approximately what your revenues were from your
13 private carrier paging system?

14 A No, sir.

15 Q Not at all?

16 A No, sir. Our computer tracks that. I don't know my
17 monthly revenue from my RCC system. The computer tracks all
18 that and Dan and Mike get the computer printouts. I have no
19 knowledge of that.

20 Q Well, Mr. Harrison, the FCC at one point asked for
21 copies of records on billing statements to customers and that
22 sort of thing? Correct?

23 A Yes, sir.

24 Q You're familiar with that request?

25 A It happened, yes, sir.

1 Q And I've looked through all these documents and I
2 didn't see any document produced showing revenues generated
3 from your private carrier paging system, Mr. Harrison.

4 MR. HARDMAN: Your Honor, what documents is counsel
5 referring to? He said he's looked through all these
6 documents. He hasn't identified any documents.

7 JUDGE CHACHKIN: What documents? Was there a
8 specific request from the FCC for revenue?

9 MR. JOYCE: Yes.

10 MS. LADEN: Yes, Your Honor. There was a document
11 -- there were documents produced that had revenue figures.

12 JUDGE CHACHKIN: I assume you have the documents?

13 MS. LADEN: We have them, Your Honor. I'm not sure
14 whether Mr. Joyce does.

15 JUDGE CHACHKIN: Well, I don't understand why you
16 asked this witness questions about revenue if you have the
17 documents that will give you the precise figures. Why are we
18 asking this witness?

19 MR. JOYCE: Because --

20 JUDGE CHACHKIN: Yes.

21 MR. JOYCE: Because there was no response to
22 documents, Your Honor, and that's my point.

23 JUDGE CHACHKIN: Well, the Bureau says they do have
24 documents about revenue.

25 MR. JOYCE: No. The confusion is the FCC at one

1 point asked Capitol to produce copies of subscriber agreements
2 and any evidence of how many customers were on the air during
3 certain periods of time, and that's --

4 MR. HARDMAN: Your Honor, what request?

5 MR. JOYCE: If I may finish, Mr. Hardman?

6 MR. HARDMAN: Well, could counsel identify the
7 request? We've had numerous requests throughout this ordeal
8 and if he could just be quite specific as to what request he's
9 talking about and --

10 MR. JOYCE: All right.

11 MR. HARDMAN: -- precisely what the request was.

12 MR. JOYCE: I will then.

13 MS. LADEN: Your Honor, if it will help, our Request
14 for Production of Documents is one of our exhibits.

15 MR. HARDMAN: I don't -- Your Honor, I don't believe
16 Mr. Joyce is referring to that. I think he's referring --

17 MR. JOYCE: No, I'm not.

18 MS. LADEN: Oh.

19 MR. HARDMAN: -- to the 308(b) inquiry in May of
20 '92, and that did not have the request that Mr. Joyce
21 characterized it as having. Are you looking for PRB 10 which
22 is the --

23 MR. JOYCE: Thank you.

24 BY MR. JOYCE:

25 Q Mr. Harrison, would you look -- there's another

1 stack of documents there. I believe that binder. Would you
2 look behind what's labeled as PRB Exhibit 10? Do you see it's
3 FCC letterhead dated May 19, 1992?

4 A Yes.

5 Q And who was this letter addressed to?

6 A Capitol Radiotelevision, sir.

7 Q And there's a reference in that first paragraph to
8 inspection on August 12, 1991 through August 15, 1991. Do you
9 see that?

10 A Yes, sir.

11 Q All right. Now would you look down to paragraph 2.
12 Do you see that paragraph?

13 A Yes, sir.

14 Q All right. Do you see where it says, "Provide the
15 name, address and telephone number of the first ten customers
16 provided service immediately following the date the station
17 was placed in operation?" Do you see that?

18 A Yes, sir.

19 Q And it also says, "Provide proof that these
20 customers were provided service, e.g., copies of service
21 agreements and/or copies of billing records for these
22 customers." Do you see that?

23 A Yes, sir.

24 Q All right. So the FCC did ask for that information
25 from your company, did they not?

1 A As far as what this states, yes, sir. It isn't --
2 my office is in Huntington and this came to the Charleston
3 address.

4 Q Right.

5 A The stuff that went to Mike -- all I know is what he
6 asked me.

7 Q I understand that. So Mr. Hardman's point is not
8 well taken here.

9 MR. HARDMAN: I object, Your Honor.

10 JUDGE CHACHKIN: You asked about revenue. There's
11 nothing here about revenue. All the questions were about
12 revenue.

13 MR. JOYCE: Billing.

14 BY MR. JOYCE:

15 Q I asked you whether or not you billed customers in
16 the first year of operations, Mr. Harrison. Is that correct?

17 A Yes, sir.

18 Q Now, you'd be able to look at those billing records
19 and determine how much revenue you were earning per month,
20 couldn't you?

21 A If I had the records, yes, sir.

22 Q Are you saying that you never keep billing records
23 in your office?

24 A No, sir. All that's computerized and all that
25 stuff's done out of our corporate headquarters in Charleston.

1 Q Okay.

2 A I keep a copy of the contract the customer fills out
3 and that's all I keep.

4 Q But if you did have paying customers in 1991 you
5 would have kept billing records and you would have turned
6 those -- or automatically billings records would have been
7 generated and Mr. Raymond would have had them? Is that
8 correct?

9 A I assume, sir.

10 Q Your testimony is that that is exactly --

11 A I don't --

12 Q -- what would happen, isn't it, Mr. Harrison?

13 A Repeat the question again, please.

14 Q If you did have paying customers in 1991 you would
15 have kept billing records for them? Isn't that correct?

16 A Yes, sir.

17 Q And Mr. Raymond at least would have those, would he
18 not?

19 A The Charleston office would, yes, sir.

20 Q Okay. But you don't know whether or not Mr. Raymond
21 ever in response to this letter from the FCC turned over those
22 billing records or not, do you?

23 A No, sir.

24 MR. HARDMAN: May I interject at this point that the
25 -- for the record, that the portion of the exhibit cited by

1 Mr. Joyce did not make any unequivocal request of that sort.
2 It asked for either -- it provides illustrations of ways to
3 comply with the request to prove that the customers were
4 provided service. There is no specific request for any
5 billing records. That's just one way in which the request
6 could have been complied with, and that's what the exhibit
7 states.

8 MR. JOYCE: That is a mischaracterization of the
9 FCC's letter. It most specifically says copies of billing
10 records.

11 JUDGE CHACHKIN: Where does it say that?

12 MR. JOYCE: Paragraph 2, Your Honor.

13 JUDGE CHACHKIN: It says for example and it provides
14 examples. It doesn't say they asked -- they didn't
15 specifically ask for billing records. If you look at it, it
16 says -- the specific request is in the first sentence, "And
17 also provide proof that these customers were provided
18 service," and they suggest as examples either copies of
19 service agreements and/or copies of billing records. But
20 there's nothing here specifically saying provide copies of
21 billing records and I assume if the FCC wanted that
22 specifically they would have asked for it.

23 MR. JOYCE: Well --

24 JUDGE CHACHKIN: But they left it apparently to
25 Capitol to decide how to provide proof.

1 MR. JOYCE: Mr. Hardman can argue on appeal, I
2 guess, or with his own witnesses --

3 JUDGE CHACHKIN: Well, I'm just reading what the
4 letter says. That's what the letter says.

5 MR. JOYCE: I thought the witness testified --
6 answered my questions accurately, so --

7 JUDGE CHACHKIN: Well, you asked him questions about
8 the billing process. He testified about that. But now we're
9 talking about what the FCC asked for.

10 MR. JOYCE: Mr. Hardman's asking about it. I am
11 not, Your Honor. I'm ready to proceed with the witness.

12 JUDGE CHACHKIN: All right.

13 BY MR. JOYCE:

14 Q Mr. Harrison, you were at the Huntington office when
15 the FCC's engineers came out to investigate in August of 1991?
16 Is that correct?

17 A The first time I knew they were there I walked in
18 the Charleston office. I lived in Charleston and they were
19 there. And then we went with them to different tower sites
20 and ended up at my office in Huntington.

21 Q Oh, I see. Did -- you just happened to be in
22 Charleston?

23 A That's where I live and that's where I drop all my
24 news and copies of contracts off at.

25 Q I follow. Now, when you ended up at the Huntington

1 office with them, do you recall one of the FCC's engineers
2 asking you about a list of customers?

3 A Yes, sir.

4 Q He asked you to provide him with a list of who your
5 private carrier paging customers were?

6 A Yes, sir.

7 Q Would you turn to Private Radio Bureau Exhibit No. 5
8 in the binder you have in front of you? Do you have that in
9 front of you?

10 A Yes, sir.

11 Q Now, the copy I have and, since we've had some
12 copying difficulties, perhaps yours is different, but mine is
13 three pages. Is yours three pages?

14 A Yes, sir.

15 Q Okay. This first page, is that your handwriting?

16 A No, sir.

17 Q Do you have any idea as who it is?

18 A It's my secretary's.

19 Q Okay. Did you ask her to, to prepare this?

20 A I don't recall. She wasn't there when we stopped by
21 that day.

22 Q Oh, so this was prepared after the FCC's visit?

23 A I assume, sir. This is the first time I've seen it.

24 Q This is the first time you've seen that page, page

25 1?